

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

GBFOREFRONT, L.P.,

Plaintiff,

-against-

FOREFRONT MANAGEMENT GROUP, LLC,
FOREFRONT CAPITAL MANAGEMENT,
LLC, FOREFRONT CAPITAL MARKETS,
LLC AND FOREFRONT ADVISORS, LLC,

Defendants.

Civil Action No.: No. 2:11-cv-07732-MSG

DECLARATION OF SEAN L. CORGAN, ESQ.

Sean L. Corgan, an attorney duly admitted to practice in this court, declares under the laws of the United States of America, as follows:

1. I am an associate of the law firm of Ricci Tyrell Johnson & Grey, attorneys for Defendants, Forefront Management Group, LLC, Forefront Capital Management, LLC, Forefront Capital Markets, LLC, and Forefront Advisors, LLC, and therefore, I have knowledge of the facts set forth herein. My firm was recently retained, along with the law firm of Porzio, Bromberg & Newman, PC, to substitute in as counsel for Defendants in the above-referenced action. I make this declaration in opposition to Plaintiff GBForefront, LP's motion seeking entry of the Consent Judgment dated May 22, 2015 and in support of Defendants' cross-motion to vacate the Amended Judgment entered by the Court on May 28, 2015.

2. Attached hereto as **Exhibit A** is a true and accurate copy of the Complaint filed by Plaintiff GBForefront, LP in the above-referenced action on December 20, 2011.

3. Attached hereto as **Exhibit B** is a true and accurate copy of the First Amended Complaint filed by GBForefront, LP against Forefront Management Group, LLC, Forefront

Capital Management, LLC, Forefront Capital Markets, LLC, and Forefront Advisors, LLC on January 10, 2014.

4. Attached hereto as **Exhibit C** is a true and accurate copy of a Judgment entered in favor of Plaintiff GBForefront, LP and against Defendants Forefront Management Group, LLC, Forefront Capital Management, LLC, Forefront Capital Markets, LLC, and Forefront Advisors, LLC on April 28, 2015.

5. Attached hereto as **Exhibit D** is a true and accurate copy of Amendment for Judgment in favor of Plaintiff GBForefront, LP and against Defendants, Forefront Management Group, LLC, Forefront Capital Management, LLC, and Forefront Advisors, LLC dated May 28, 2015.

6. Attached hereto as **Exhibit E** is a true and accurate copy of Consent Judgment Against Forefront Capital Markets, LLC dated May 22, 2015.

7. Attached hereto as **Exhibit F** is a true and accurate copy of Agreement of Limited Partnership of GBForefront, LP dated May 12, 2010.

8. Attached hereto as **Exhibit G** is a true and accurate copy of Amended and Restated Agreement of Limited Partnership of GBForefront, LP dated August 31, 2010.

9. Attached hereto as **Exhibit H** is a true and accurate copy of Agreement and Assignment of Limited Partnership Interest dated August 31, 2010.

10. Attached hereto as **Exhibit I** is a true and accurate copy of Objections and Responses to Defendant Forefront Management Group, LLC's First Set of Interrogatories Addressed to Plaintiff dated April 17, 2015 in the above-captioned matter.

11. Attached hereto as **Exhibit J** is a true and accurate copy of the Inventory filed with the Register of Wills of Montgomery County, Pennsylvania for the Estate of Warren Weiner dated May 13, 2013.

12. Attached hereto as **Exhibit K** is a true and accurate copy of a letter from Gary M. Fellner, Esq. to Gary Lightman, Esq. dated December 2, 2015.

13. Attached hereto as **Exhibit L** are true and accurate copies of the signature pages of the Confidential Forbearance and Settlement Agreement and the Tolling Agreement both dated May 22, 2015.

I declare under the laws of the United States of America that the foregoing is true and correct.


Sean L. Corgan

Dated: January 22, 2016